

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

APR 16 2018

David J. Bradley, Clerk of Court

United States of America  
V  
Jesus Angel MENDEZ-Palacios  
Mexican National  
YOB 1970

Case No.

M-18-0792-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 14, 2018 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

21 United States Code § 841

defendant did knowingly and intentionally possess with the intent to distribute approximately 16.72 kilograms of cocaine a scheduled II controlled substance

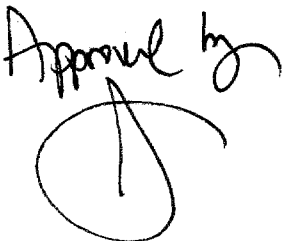
21 United States Code § 952

did knowingly and intentionally import from the United Mexican states into the United States approximately 16.72 kilograms of cocaine a scheduled II controlled substance

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

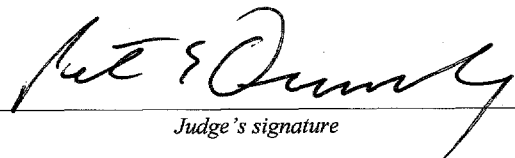
Approved by  


Complainant's signature

Mark Quintanilla, TFO HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/16/20188:27 am

Judge's signature

City and state: McAllen, Texas

Peter Ormsby, U.S. Magistrate Judge

Printed name and title

**Attachment "A"**

On April 14, 2018, Homeland Security Investigations (HSI), McAllen, Texas, was notified by US Customs and Border Protection (CBP) that Jesus Angel MENDEZ-Palacios, along with his son, had attempted to make entry into the United States via the Pharr Port of Entry in Pharr, Texas. MENDEZ-Palacios was the driver and owner of a black 2011 Dodge Ram displaying Mexican license plates ZXZ554W. MENDEZ-Palacios was selected for secondary inspection.

During secondary inspection, MENDEZ-Palacios' vehicle was referred to z-portal in which CBP Officer noticed anomalies in the floor underneath the center console. A K9 inspection of the vehicle resulted in a positive alert to the odor of narcotics. Upon further inspection of MENDEZ-Palacios' vehicle, CBP Officer discovered 15 fifteen bricks of suspected narcotics concealed in a man-made compartment in underneath the center console of the vehicle. A field test of the bricks indicated that the substance tested positive for cocaine. The 15 bricks were weighed and a total weight of 16.72 kilograms was reached.

CBP Officers conducted a pat down of MENDEZ-Palacios and located a small baggie containing cocaine residue in his groin area. MENDEZ-Palacios voluntarily stated to CBP Officers that he had consumed the cocaine to keep him calm as he attempted to make entry into the United States.

HSI McAllen Special Agents responded to the Pharr Port of Entry to interview MENDEZ-Palacios. Prior to reading MENDEZ-Palacios his Miranda Warnings, MENDEZ-Palacios advised that he knew he had problems, but his son (who was travelling with him) had nothing to do with it. MENDEZ-Palacios was advised of his Miranda Warnings in which MENDEZ-Palacios requested to have an attorney present during questioning.